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June 23, 2023

Via ECF

Honorable Brian M. Cogan
United States District Judge
U.S. District Court, Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

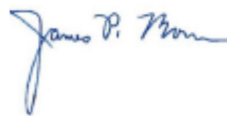
**Re: *Force, et al. v. Qatar Charity, Qatar National Bank and Masraf al Rayan,*
1:20-cv-02578-BMC**

Dear Judge Cogan:

On behalf of the Plaintiffs in the above-captioned action, I respectfully submit the enclosed Second Circuit decision in *Spetner v. Palestine Investment Bank*, No. 20-3849, 2023 WL 4035924 (June 16, 2023) in further support of Plaintiffs' opposition to Defendants' pending motions to dismiss.

In *Spetner*, the Second Circuit reversed Judge Komitee's dismissal of Anti-Terrorism Act claims for lack of personal jurisdiction in circumstances where a New York correspondent account was used by the defendant's agent to transfer funds to organizations that served as proxies for terrorist groups in the Palestinian Territories. *See especially* Slip Op. at 13-14, 2023 WL 4035924 at *4-5 (discussing the principal's "control" of the agent).

Respectfully submitted,



James P. Bonner

Enclosure